

# **MEMO ENDORSED**

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March 31, 2025

**BY ECF**

Hon. Laura Taylor Swain  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

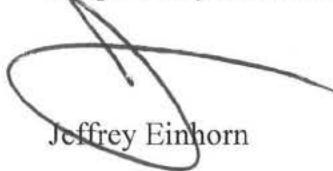
**Re: United States v. Constantinescu, et al., 19 CR 651 (LTS)**

Dear Judge Swain:

I am writing on behalf of defendant Theofrastos Lymberatos to respectfully request permission for the defendant to travel to Kefalonia, Greece from April 3 through April 11, 2025 in order to attend the funeral of his grandmother, who passed away this weekend. The government, by AUSA Margaret Lynaugh, and Probation, by USPO Rosie Anderson, both have no objection to this application. If approved, Mr. Lymberatos would provide a detailed travel itinerary to USPO Anderson.

Thank you for the Court's consideration of this application; I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Einhorn

cc: AUSA Maggie Lynaugh (by ECF)  
USPO Rosie Anderson (by email)

The foregoing request is granted. DE 1575 resolved.  
SO ORDERED.  
3/31/2025  
/s/ Laura Taylor Swain, Chief USDJ